Application No.: 09/977,746 Docket No.: 09432/183002

## REMARKS

Applicant thanks the Examiner for carefully considering the application. Please reconsider the application in view of the above amendments and the following remarks.

## Disposition of Claims

Claims 10-19 are pending in the application. Claim 10 is an independent claim from which the remaining claims depend from either directly or indirectly.

## **Summary of Claim Amendments**

Claim 10 is amended by this reply to clarify the make-up sequence of the threaded connection. In particular, claim 10 is amended to include distributing stresses among the positive stop torque shoulder and the internal and external load and stab flanks upon make-up of the connection. Support for the amendments may be found in the specification as originally filed. Particularly, paragraph 3 discusses the certain issues with wedge threads, including wear from multiple make and breaks of the threads, which may be primarily caused by deformation of the threads. Thus, an aim of the present invention is to incorporate a positive stop torque shoulder in conjunction with the wedge thread to better control the axial make-up of the connection, i.e., allow the torque shoulder to assume some of the deformation due to torque and take it from the wedge threads.

## Claims rejected under §102

In the Office Action, the Examiner rejected claims 10-19 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 4,822,081 ("Blose"). Applicant respectfully traverses

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this rejection on the basis that the Blose reference does include each and every element as required. The Federal Circuit has held that "[a]nticipation under 35 U.S.C. §102 means lack of novelty, and is a question of fact. To anticipate, every element and limitation of the claimed invention must be found in a single prior art reference, arranged as in the claim." Brown v. 3M, 265 F.3d 1349, 1351 (Fed. Cir. 2001) (emphasis added). Therefore, in order to properly reject claim 1 under 35 U.S.C. §102, the Blose reference must include each and every element and limitation as arranged therein.

Claim 10, as amended, requires, *inter alia*, deforming the positive stop torque shoulder and the internal and external load and stab flanks, wherein stresses are distributed between the positive stop torque shoulder and the internal and external load and stab flanks at the final make-up such that plastic deformation of the internal and external load and stab flanks does not occur. The invention as claimed enables a portion of the make-up torque to be applied to the positive stop torque shoulder instead of being applied to the wedge threads. This prolongs the life of a connection because it decreases thread wear. The invention as claimed may also prevent irreversible plastic deformation of the threads that may occur during make-up.

In contrast, Blose discloses that the mating shoulder 41 and 43 and end faces 42 and 44 become deformed after making contact upon application of high axial compressive loading—e.g., driving forces. As described in Blose for use with larger sized outer casing, impact driving may be used to drive the casing, which is already made up of a number of sections, to a particular depth. As such, the individual casing members have already been made up to a "final make-up" without any deformation occurring in the mating shoulders and end faces. Rather, deformation in the mating shoulders and end faces occurs after the final make-up,

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and only because of the axial forces applied on the casing during the impact driving. Therefore, Blose does not include each and every element as required by amended claim 10, and is therefore allowable. Further, because they properly depend from allowable claim 1, claims 11–19 are

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591, Reference No. 09432/183002.

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allowable for at least the same reasons.

Respectfully submitted,

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